

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CIVIL ACTION No.: 03 cv 12573 EFH

BERNADINE T. GRIFFITH
Plaintiff

vs.

ONEBEACON INSURANCE COMPANY,
ONEBEACON AMERICA INSURANCE
COMPANY, MICHAEL A. SISTO, and
KAREN ALLEN HOLMES
Defendants

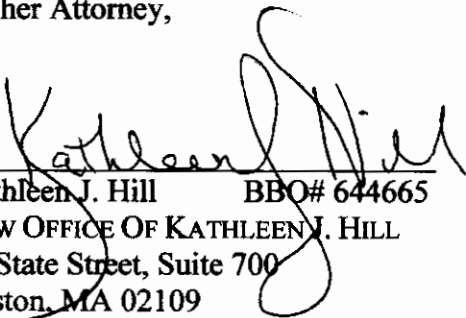
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U.S. DISTRICT COURT
DISTRICT OF MASS.

PLAINTIFF'S TRIAL EXHIBIT LIST

Per this Court's December 22, 2005 Order, the Plaintiff, Bernadine T. Griffith, submits for filing with the Clerk the attached Plaintiff's Exhibit List (Exhibits 1-63), which this day has been served on the Defendants.

Respectfully submitted,
BERNADINE T. GRIFFITH
By her Attorney,

Date: May 8, 2006


Kathleen J. Hill BBO# 644665
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Boston, MA 02109
617.742.0457 (O)

PLAINTIFF'S EXHIBIT LIST

Exhibit # Description

1	MCAD0211-212 - November 21, 1994 Griffith Performance Appraisal MCAD0209-210 - November 15, 1995 Griffith Performance Appraisal MCAD0206-207 - November 11, 1996 Griffith Performance Appraisal MCAD0204 - October 14, 1997 Griffith Performance Appraisal MCAD0201-202 - December 17, 1998 Griffith Performance Appraisal MCAD0199-200 - January 7, 2000 Griffith Performance Appraisal
2*	MCAD0459-460 - August 20, 1996 Irene H. Bagdoian letter to Albert Battistini, VP of Commercial Union
3*	MCAD - October 25, 1996 Cathleen Moynihan Memo to Griffith and Freeman
4*	MCAD0479-481 - June 25, 1997 Thomas G. Ford letter to MCAD Muir Investigator, Respondent's Position Statement
5*	January 5, 2000 Performance Appraisal executed by Holmes
6*	MCAD0089 - January 20, 2000 Dr. Gupta medical note - request for accommodation - 10 am to 6:15pm
7*	MCAD0461- July 1, 1997 Erin M. O'Toole letter to Cathleen M. Moynihan of H.R., Commercial Union, with attached MCAD0463 - June 9, 1997 Helen D. Tramosch, M.D. letter to Erin M. O'Toole, requesting accommodation to perform work in a less stressful environment, work at home 2 days a week; MCAD0128 - June 9, 1997 Helen D. Tramosch, M.D. letter to Erin M. O'Toole, requesting accommodation to perform work in a less stressful environment, work at home 2 days a week.
8*	MCAD0076 - 77 - May 23, 2000 CGU Associate Disciplinary Action Notice
9*	MCAD0081 - November 20, 1996 Gowdy Memo regarding CU Sick Time Policy
10*	Plaintiff's Complaint Exhibit 11 - May 23, 2000 Emergency Department medical note
11*	MCAD0084 - May 23, 2000 Dr. Seek medical note
12*	MCAD0163-165 June 5, 2000 Joanne M. Murphy of CGU letter to Bernadine T. Griffith with June 2, 2000 Family and Medical Leave Act Certification Form
13*	MCAD0162 - June 12, 2000 John Garrison, Ph.D., FA ClinP, Lahey Clinic Memo regarding Bernadine Griffith
14*	MCAD0160 - June 22, 2000 John Garrison, Ph.D., FA ClinP, Lahey Clinic Memo regarding Bernadine Griffith
15*	MCAD0078 - 79 - July 27, 2000 CGU Associate Disciplinary Action Notice
16*	MCAD0574 - 577 - August 10, 2000Cristin L. Rothfuss letter to Michael Sisto CGU
17*	MCAD0134 - September 27, 2000 Sisto letter to Bernadine Griffith
18*	Plaintiff's Complaint Exhibit 19 - October 19, 2000 Cristin L. Rothfuss e-mail to Bernadine Griffith
19*	Plaintiff's Complaint Exhibit 20 - October 23, 2000 Kenneth L. Kimmell letter to Bernadine Griffith
20*	Plaintiff's Complaint Exhibit 21 - January 29, 2001 Intent to retire from CGU package to Bernadine Griffith
21*	MCAD0302 - 307 - July 26, 2000 Probable Cause Finding with Investigative Fact Sheet regarding December 6, 1999 Recommendation to Vacate a Lack of Probable Cause Finding and Enter a Probable Cause Finding

*Exhibits correspond with Exhibits 2 - 22 of Plaintiff's Verified Complaint

22	MCAD0059 - December 6, 1999 Nancy M. To letter to Attorney Cushner informing that 1997 claim is remanded for further investigation at the MCAD
23	MCAD0060 - 81 - January 10, 2000 Respondent's Position Statement
24	MCAD0083 - October 20, 1999 Susan E. Moner, M.D. request for accommodation by having lift limit of up 10 pounds; not pack or unpack boxes or crates; lift, pull or push greater than 10 pounds.
25	MCAD0087 - July 17, 2000 Barry R. Zitin, M.D. request for accommodation to reduce stress at work, including occasional breaks, with MCAD0091 July 17, 2000 Griffith Memo to Nancy Synder and Karen Holmes
26	MCAD0088 - July 26, 2000 John Garrison, Ph.D. letter authenticating Dr. Zitin's request to reduce stress at work
27	MCAD0090 - February 1, 2000 Griffith e-mail to Holmes regarding update of 1997 medical report per Holmes request
28	MCAD0092 - July 5, 2000 Griffith e-mail to Holmes regarding advanced notice of medical appointments
29	MCAD0096 - January 28, 1999 Scanlon e-mail to Griffith regarding contacting PA office before coming into work
30	MCAD0097 - Holmes 2/1/00 Vacation carryover days
31	MCAD0100 - Dai August 26, 1999 e-mail to Griffith about moving
32	MCAD0099 - 98 - September 27, 2000 Griffith's last CGU pay check; October 13, 2000 Anne Sanford letter to Griffith**
33	MCAD0104 and MCAD0106 - July 31, 1997 Attending Physician's Report of Helen Tramosch, M.D., with Salary Continuation Claim Form
34	MCAD0107-08 - September 26, 1996 Attending Physician's Report of Helen Tramosch, M.D., with Salary Continuation Claim Form
35	MCAD0117-0118 - June 9, 1997 Attending Physician's Report of Helen Tramosch, M.D., with Salary Continuation Claim Form
36	MCAD0119-125 - June 30, 1997 Attending Physician's Report of Helen Tramosch, M.D., with Salary Continuation Claim Form
37	MCAD0136-140- January 30, 2001 - May 24, 2001 Employment Ads
38	MCAD0155-158 - Griffith's handwritten calendar from June 2000 - September 2000 documenting arrival time
39	MCAD0159 - July 15, 2002 Queenan letter to Sarah L. Fisher, Field Representative at MCAD
40	Monica Scanlon deposition exhibits Exhibit 3 - 12/23/98 letter Exhibit 6 - 5/21/98 Memo Exhibit 7 - List with pen markings
41	MCAD0130 - July 10, 1997 Lenore M. Woodley letter to Dr. Tramosch
42	MCAD0255 - 1998 Benefits Open Enrollment Statement regarding Bernadine Griffith**
43	MCAD0507 - 509 - April 29, 1997 Charge of Discrimination
44	MCAD0474-478 - August 4, 1997 Complainant's Affidavit in Support of Her Rebuttal to Respondent's Position Statement

45	MCAD0411 – 418 - Edmund Freeman Performance Appraisals (1993 -1996)
46	Exhibit 8 of Monica Scanlon Deposition -- 2000 OneBeacon Insurance Employee's Benefits Handbook
47	DEF2604 – 2670 - 2000 OneBeacon Insurance Associate Handbook
48	Plaintiff's work e-mails dated 1995 to 2000: P292, 307, 313, 335, 337, 338, 339 – 380, 384 -386, 392 -393, 402 – 419, 424 – 431, 434 – 437, 441 - 443, 445, 453 – 457, 459 – 460, 462, 464 – 465, and 468.
49	P308 March 8, 1996 Field Office Image Status Report
50	P266 – 2000 Notice to Griffith that she may not participate in the Information Systems Staff Retention Program
51	P265 – December 27, 1999 Griffith letter to Kemper National Services relating to her short-term disability absence**
52	P495 – P501 - October 1, 2000 -- December 31, 2000 Vanguard Statement**
53	P508 – 514 - July 01, 2000 – September 30, 2000 Vanguard Statement**
54	P481 – 482 – 1997 Commercial Union Personal Benefits Statement pertaining to Griffith**
55	P487 – 488 – December 31, 1993 Commercial Union Employee Savings Plan Investment Portfolios pertaining to Griffith**.
56	P489 – 490 – January 1999 CGU Commercial Union Employee Savings Plan Participant Memo with attached final Employee Saving Plan Statement pertaining to Griffith**
57	P502 – March 6, 1997 advice of deposit for 3/7/97 pay period pertaining to Griffith**
58	P507 – September 25, 2003 Check Confirmation pertaining to Griffith's disability distribution**
59	January 28, 1998 Application For Disabled Placard/Plate, as produced via Dr. Tramposch's Lahey Clinic administrative records**
60	P264 - October 12, 2004 Dr. Moner back-to-work letter**
61	2001 Massachusetts Commission Against Discrimination Annual Report
62	2002 Massachusetts Commission Against Discrimination Annual Report
63	2003 Massachusetts Commission Against Discrimination Annual Report

**Exhibits pertaining to any and all financial documentation and personal identification are redacted.

Plaintiff reserves the right to supplement her exhibit list.

CERTIFICATE OF SERVICE

I, Kathleen J. Hill, certify that I served a true and accurate copy of the foregoing Plaintiff's Trial Exhibit List on the counsel of record: *Keith B. Muntyan and Leah M. Moore*, of Morgan, Brown & Joy, Two Hundred State Street, 11th Floor, Boston, Massachusetts 02109 by pre-paid U.S. Mail and facsimile on this 8th day of May 2006.


Kathleen J. Hill